

File No. 30516-0001-JCG

PARKER McCAY P.A.

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Attorneys for Defendants, Ronald A. Cundey, in his official capacity as Chief of Police of the Harrison Township Police Department and John Polillo, in his official capacity as Chief of Police of the Glassboro Police Department

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

SANDRA KENDRICK, CAROL
KINKADE, NANCY MERRITT,
BOB'S LITTLE SPORT SHOP,
INC., ASSOCIATION OF NEW
JERSEY RIFLE & PISTOL CLUBS,
INC., NEW JERSEY SECOND
AMENDMENT SOCIETY, COALITION
OF NEW JERSEY FIREARM OWNERS,
FIREARMS POLICY COALITION,
and SECOND AMENDMENT
FOUNDATION, INC.

Plaintiffs,

v.

GURBIR GREWAL, in his
official capacity as Attorney
General of New Jersey;
PATRICK J. CALLAHAN, in his
official capacity as
Superintendent of the New
Jersey Division of State
Police; MICHAEL GAIMARI, in
his official capacity as
Chief of Police of the
Bridgeton Police Department,
RONALD A. CUNDEY, in his
official capacity as Chief of
Police of the Harrison
Township Police Department,
and

HONORABLE ROBERT B. KUGLER

CIVIL ACTION NO. 21-cv-06231-RMB-AMD

CIVIL ACTION

JOHN POLILLO, in his official
capacity as Chief of Police
of the Glassboro Police
Department,

Defendants.

NOTICE OF MOTION TO DISMISS PLAINTIFFS' COMPLAINT PURSUANT TO
FED. R. CIV. P. 12(b)(6) ON BEHALF OF DEFENDANTS, RONALD A.
CUNDEY, in his official capacity as Chief of Police of the
Harrison Township Police Department and JOHN POLILLO, in his
official capacity as Chief of Police of the Glassboro Police
Department

TO:

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and

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Plaintiffs**

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Nancy Merritt, Bob's Little
Sport Shop, Inc., Association
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Clubs, Inc., New Jersey Second
Amendment Society, Coalition Of
New Jersey Firearm Owners,
Firearms Policy Coalition, And
Second Amendment Foundation,
Inc.

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**Attorneys for Plaintiff,
Association of NJ Rifle &
Pistol Clubs, Inc.**

PLEASE TAKE NOTICE that on July 6, 2021, at 9:00 a.m., or as soon thereafter as counsel for may be heard, the undersigned attorneys for Defendants, Ronald A. Cundey, in his official capacity as Chief of Police of the Harrison Township Police Department and John Polillo, in his official capacity as Chief of Police of the Glassboro Police Department, will apply to the United States District Court of New Jersey, Mitchell H. Cohen U.S. Courthouse, 1 John F. Gerry Plaza, P. O. Box 2792, Camden, New Jersey, 08101, for an Order dismissing Plaintiffs' Complaint pursuant to Fed. R. Civ. P. 12(b)(6). Attached hereto in support of this Motion to Dismiss, is the Brief and a proposed form of Order.

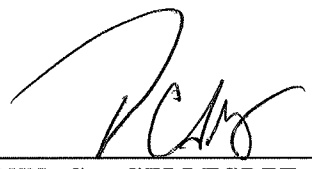
PARKER McCAY P.A.
Attorneys for Defendants,
Ronald A. Cundey, in his official
capacity as Chief of Police of the
Harrison Township Police Department and
John Polillo, in his official capacity
as Chief of Police of the Glassboro
Police Department

BY: 
JOHN C. GILLESPIE, ESQUIRE

Dated: June 3, 2021

I hereby certify that the original Notice of Motion and an original proposed form of Order were served and filed pursuant to the Federal Rules of Civil Procedure and the Local District Court Rules.

BY: _____


JOHN C. GILLESPIE, ESQUIRE

Dated: June 3, 2021
4822-0246-6023, v. 1